

**Aaron Hansome**

**1st Texas Health & Life LLC**

**222 N. Expressway Suite 159**

**Brownsville, Texas 78521-2258 (Cameron County)**

**Email Address: AaronMHansome@gmail.com**

**Date: January 7, 2025**

**To:**

**Honorable Judge Reed C. O'Connor**

**United States District Court**

**Northern District of Texas**

**501 West 10th St., Rm. 310**

**Fort Worth, TX 76102**

**Re: Case No. 4:24-cv-01022**

**Plaintiff: Mrs. Kelly Bland**

**Defendant: Aaron Hansome**

**Dear Honorable Judge O'Connor,**

**Subject: Submission of USB Containing Audio Exhibits & Additional Details to Existing Exhibits**

**I am submitting Exhibits B and C in the form of a USB, as these are audio recordings that cannot be submitted through the court's electronic filing system. These exhibits supplement the previously filed transcriptions of the calls in exhibits list (A-6 & A-7) and will provide the actual call recordings.**

**The exhibits on the USB include:**

**Exhibit B: Audio recording of inbound call initiated by Mrs. Kelly Bland (formerly Mrs. Kelly Pinn) after missing our 1 outbound call, but seeing the number on caller ID on April 10, 2024, at 11:51 AM CST.**

**Exhibit C: Audio recording of inbound call Mrs. Bland claimed to be transferred to us by an unknown vendor on April 16, 2024, at 3:47 PM CST.**

**These recordings are significant as they demonstrate Mrs. Bland's proactive engagement with my office regarding insurance inquiries and reflect the chronology of events outlined in previously submitted evidence.**

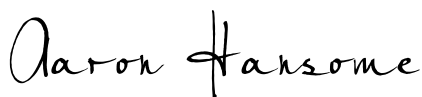
**Additionally, I have amended the exhibits list to include Exhibits B and C for clarity, as well as more details for previously submitted exhibits to ensure consistency, accuracy, and clarity in presenting evidence to the Court.**

**The USB containing these exhibits will be promptly mailed to the court.**

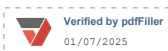
**Thank you for your time and consideration.**

**Respectfully submitted,**

**Aaron Hansome**



**Pro Se Defendant**



## Certificate of Service

I hereby certify that on January 7, 2025, a true and corrected copy of the amended exhibits list, along with Exhibits B and C (emailed audio files containing audio recordings), was served on the Plaintiff by the following method:

Via Email:

Mrs. Kelly Bland

██████████@gmail.com

Respectfully,

*Aaron Hansome*

Aaron Hansome

Pro Se Defendant



| Chronology of Events with Mrs. Kelly Bland (formerly Mrs. Kelly Pinn) |           |                                  |  |
|---|-----------|----------------------------------|--|
| Exhibit No.   | Date      | Medium                           | Description  |
| A-1   | 9-Apr-24  | WhatsApp Chat                    | WhatsApp conversation, Amjad gives Aaron a non-compliant list.   |
| A-2   | 10-Apr-24 | WhatsApp Chat                    | WhatsApp conversation, Aaron tells Amjad it's 37% DNCs. It's very serious and he's already terminated a few vendors for this.  |
| A-3   | 10-Apr-24 | Aaron's Email                    | Aaron emails Robert at Data Zapp to find out why there are DNCs after paying for the list to be scrubbed.  |
| A-4   | 10-Apr-24 | Robert's Email                   | Robert at Data Zapp emails back explaining that their system only flags the numbers, but does not remove them.   |
| A-5   | 10-Apr-24 | Scrubbed List                    | The first page of the scrubbed list from DataZapp showing DNCs including Mrs. Pinn's number, a gentleman that told Aaron he was on the DNC & Wes Newman's.   |
| A-6   | 10-Apr-24 | Mrs. Pinn's Call Back Transcript | Mrs. Pinn saw the 1st Texas missed call on her caller ID and called back. Exhibit A7 is the call transcription. Aaron misidentified where the call was coming from and answered "Legal Touch" thinking it was his doc prep start up company. |
| A-7   | 16-Apr-24 | Mrs. Pinn's Inbound Transcript   | Our office receives another inbound call from Mrs. Pinn's number, and she speaks with one of my contractors, and again doesn't tell us that we have a rogue vendor so we can take action.  |
| A-8   | 18-Apr-24 | Mrs. Pinn's Email                | Mrs. Pinn's emails 1st Texas, stating that <u>she was transferred to Aaron</u> which <b>contradicts the recording and transcription of the call</b> where <u>she states that she saw the missed call and called back.</u>                    |
| A-9   | 21-Apr-24 | WhatsApp Chat                    | WhatsApp Chat, Forwarded Wes Newman's Email to Amjad/P-Tech , <u>and Aaron reiterated that he wouldn't buy anymore calls from P-Tech.</u>  |
| A-10  | 23-Apr-24 | Aaron's Email                    | Aaron emails Mrs. Pinn explaining what happened, and the P-Tech was the guilty party. He also explains that his finances have been consistently bad and he doesn't want to offend her with a low offer.                                      |

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|------|-------------------|------------------------|--|
| A-11 | 23-Apr-24         | Mrs. Pinn's Email      | Mrs. Pinn explains in email that Aaron can be held personally liable offers to settle for \$3000 with a deadline of the following day and gives Aaron the options of Wire, Zelle, or Venmo.  |
| A-12 | 26-Apr-24         | Mrs. Pinn's Email      | When Aaron doesn't respond to the \$3000 offer by the deadline, <u>Mrs. Pinn calls his office and tells one of his contractors to have Aaron call her immediately then sends a follow-up email asking Aaron to either call the same number she requested no more calls on, or email. Mrs. Pinn's explains that her emails are tracked, and that his silence dictates her next move.</u>  |
| A-13 | Approx. 4/26/2024 | RingCentral Screenshot | Screenshot of 1st Texas' internal RingCentral call blocking showing Mrs. Pinn's number and several others from Mrs. Pinn's Area Code.  |
| A-14 | 29-Apr-24         | Aaron's Email          | Aaron emails Wes Newman explaining that P-Tech was in a compliance agreement and Aaron gives Wes Amjad's contact information as the CEO for P-Tech and offers to provide more assistance to Wes if it's needed.  |
| A-15 | 4/10-4/26/24      | RingCentral Download   | RingCentral Call Log Search of Mrs. Pinn's number showing inbound call dates, and the duration of each call. Notes added for clarity.  |
| A-16 | 1-May-24          | Mrs. Pinn's Email      | Mrs. Pinn gives Aaron another opportunity to settle for presumably the prior offer of \$3000, which was more than the office could afford at the time. Mrs. Pinn shares that she will be discussing Aaron's case with her attorney as they pursue her latest TCPA class action law suit. Mrs. Pinn invites Aaron to <u>"google or search me in Pacer to confirm my sincerity to follow through with my rights under the law."</u> Aaron did that, and found 31 TCPA lawsuits filed by Mrs. Pinn in approximately the last 3 years. |

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|------|-----------|--------------------|--|
| A-17 | 2-May-24  | Aaron's Email      | Aaron writes Mrs. Pinn an email <a href="#">offering \$300 as an installment</a> from an overage that week on our invoice, and <a href="#">gives her P-Tech's information</a> for the opportunity to pursue the guilty party, also addressing a vendor reaching out to her, which was likely the result of our vendor's being questioned about her claims. The vendor that contacted Mrs. Pinn remains a mystery to this day, and no vendor ever tried to get paid for transferring her to 1st Texas which seems odd considering the call on te 16th of April lasted over 5 minutes. |
|      |           |                    |  |
| A-18 | 20-Sep-24 | Mrs. Bland's Email | On Friday September 20th, 1st Texas was emailed by an individual named Kelly Bland, with an email address of kellybland516@gmail.com requesting our internal DNC policy with no other context.   |
| A-19 | 26-Sep-24 | Aaron's Email      | The following week we sent the DNC policy and didn't hear anything back for a few weeks.   |
| A-20 | 16-Oct-24 | Mrs. Bland's Email | On the 16th of October, 6 months after 1st Texas trusted an irresponsible lead vendor, who supplied us with a list of non-compliant leads that we called on for less than 4 hours the former Mrs. Pinn, now Mrs. Bland demands 12,000 without any identification of who she was. I get a lot of emails and some percentage of them are just scams, and bad actors trying to take advantage of others. I didn't notice the drafts that were attached because I assumed it was someone phishing or with bad intertions.  |
| A-21 | 8-Nov-24  | BizFilings Email   | On Friday November the 8th, I received an email from BizFilings, the attorneys that helped me organize 1st Texas, notifying me that I was being sued for \$54,000. When I looked at the law suit Mrs; Bland's phone number was redacted, as it was been in everyone of her 31 TCPA lawsuits in the last 3 years or a little over. It took some investigation to even realize this was the former Kelly Pinn. I was able to cross reference the   |

|      |          |                                      |  |
|------|----------|--------------------------------------|--|
|      |          |                                      | phone number Mrs. Bland claims is mine or someone working for me, but 1st Texas never had a markeing department, and only bought leads from vendors we belived were compliant, and if I found out they weren't, I terminated them. |
| A-22 | 1-Jan-25 | Declaration Under Penalty of Perjury | Declaration by Amjad (P-Tech CEO), acknowledging non-compliance.   |

| Audio Recordings of Mrs. Bland's (formerly Mrs. Pinn's) Inbound Calls To Our Office |           |                   |  |
|---|-----------|-------------------|--|
| Exhibit No.   | Date      | Medium            | Description  |
| Exhibit B   | 10-Apr-24 | USB: To Be Mailed | <p><b>Title:</b> Audio recording of inbound call initiated by Mrs. Kelly Bland (formerly Pinn) on April 10, 2024, at 11:51 AM CST.</p> <p><b>Description:</b> Mrs. Bland returned a missed call from the office, expressing interest in insurance. Audio file provided on USB.</p> |
| Exhibit C   | 16-Apr-24 | USB: To Be Mailed | <p><b>Title:</b> Audio recording of inbound call initiated by Mrs. Kelly Bland (formerly Pinn) on April 16, 2024, at 3:47 PM CST.</p> <p><b>Description:</b> Mrs. Bland inquired about insurance options during the call. Audio file provided on USB.</p>                          |

| Compliance Contracts |           |          |  |
|----------------------|-----------|----------|--|
| Exhibit No.          | Date      | Location | Description  |
| D-1                  | 7-Nov-24  | USA      | Echo Media LLC   |
| D2                   | 11/5/2024 | India    | RaniSavita Info Hub  |
| D-3                  | 19-Apr-24 | USA      | Ryan Johnson (Adams Network/Ring Incentive)- Terminated For Non-Compliance |
| D-4                  | 25-Apr-24 | USA      | Mark DuBois (Cannaball Ads)  |
| D-5                  | 7-Nov-24  | Pakistan | Salman Abbasi (AS Communication BPO)                                       |
| D-6                  | 8-Jul-24  | USA      | Elina Vaseli (Phoenix BPO)   |
| D-7                  | 1-Jul-24  | USA      | Nathan Eddy (Rocktown Media)   |
| D-8                  | 6-Mar-24  | Pakistan | Amjad Adil (P-Tech) - Terminated For Non-Compliance                        |

|      |           |          |   |
|------|-----------|----------|---|
| D-9  | 10-Nov-23 | USA      | Erik Wolf (Wolfpack Media Group)                                    |
| D-10 | 9-Nov-23  | Pakistan | Talkline BPO - <b>Terminated For Non-Compliance</b>                 |
| D-11 | 9-Nov-23  | Pakistan | Wasi Communications - <b>Terminated For Non-Compliance</b>          |
| D-12 | 19-Feb-24 | India    | Zocyoiimpex   |
| D-13 | 24-Sep-23 | Florida  | Remote Agent Sydney Honeycutt's Contractor and Compliance Agreement |

| Chronology of Events with Mrs. Starling |                         |  |  |
|---|-------------------------|--|--|
| Exhibit No.                             | Date                    | Medium                                       | Description  |
| E-1                                     | 13-Dec-23               | Mrs. Starling's Signed consent w/audit trail | Emailed Consent Form To Mrs. Starling allowing my Agency to work on her behalf to get her insurance. She signed it (with audit trail). |
| E-2                                     | 18-Dec-23               | Emails From Mrs. Starling                    | Communication from Mrs. Starling indicating an increase in settlement demands.   |
| E-3                                     | 12/13-12/28/23          | WhatsApp chat                                | <b>WhatsApp chats with Wajid (Talkline BPO) &amp; termination.</b>   |
| E-4                                     | 12/14-12/18/23          | WhatsApp chat                                | <b>WhatsApp chats with Sami (Wasi Communications) &amp;termination.</b>  |
| E-5                                     | 11/09/2023 & 11/11/2023 | Signed Contracts                             | <b>Signed Compliance agreements with the <u>most probable</u> offending vendors.</b>   |

| Business, Personal, & Community Character Reference Letters |           |               |   |
|---|-----------|---------------|---|
| Exhibit No.   | Date      | Medium        | Description   |
| Exhibit H-1   | 3-Jan-25  | Signed Letter | Cover Letter for Character References by Aaron Hansome                    |
| Exhibit H-2   | 1-Jan-25  | Signed Letter | Albert Latorre – Friend & Business Associate                              |
| Exhibit H-3   | 1-Jan-25  | Signed Letter | Kent Kuszajewski – Businessman & Community Associate                      |
| Exhibit H-4   | 1-Jan-25  | Signed Letter | Lucitania Nieto – Former Business Associate                               |
| Exhibit H-5   | 1-Jan-25  | Signed Letter | Mubashir Naveed Anwar – Virtual Administrative Associate                  |
| Exhibit H-6   | 1-Jan-25  | Signed Letter | Ramish Mahmood – Former <b>Insurnace</b> Virtual Administrative Assistant |
| Exhibit H-7   | 31-Dec-24 | Signed Letter | Patricia Robles Smothers – Community Member, Former Business Assoc.       |



|              |           |               |  |
|--------------|-----------|---------------|--|
| Exhibit H-8  | 1-Jan-25  | Signed Letter | Samantha Johnson – Community Member & Former Business Assoc. |
| Exhibit H-9  | 31-Dec-24 | Signed Letter | Thomas Chant – Personal Mentor                               |
| Exhibit H-10 | 2-Jan-25  | Signed Letter | Jim Harless – Personal Associate                             |
| Exhibit H-11 | 1-Jan-25  | Signed Letter | Jeffrey Smothers – Friend & Community Member                 |
| Exhibit H-12 | 31-Dec-24 | Signed Letter | Edgar Burgos Arce – Personal Associate & Community Member    |
| Exhibit H-13 | 31-Dec-24 | Signed Letter | Winfield Wallace Tobey – Community Member                    |
| Exhibit H-14 | 31-Dec-24 | Signed Letter | Martin Gee – Friend & Community Member                       |
| Exhibit H-15 | 30-Dec-24 | Signed Letter | Kathy Gutierrez – Friend & Community Member                  |
| Exhibit H-16 | 31-Dec-24 | Signed Letter | Margaret S. Murtagh – Friend & Community Member              |
| Exhibit H-17 | 31-Dec-24 | Signed Letter | Rodney Erickson – Friend & Community Member                  |
| Exhibit H-18 | 7-Jan-25  | Signed Letter | Robert Leighton Richards – Business, Personal, and Community |

| Comprehensive Summary of TCPA Litigation Strategies |           |          |  |
|---|-----------|----------|--|
| Exhibit No.   | Date      | Medium   | Description  |
| I-1   | Various   |          | Summary of Litigation Patterns                               |
| I-2   | Various   |          | Visual Summary of TCPA Cases                                 |
| I-3   | Various   |          | Simplified Summary of TCPA Cases Involving Kelly Pinn-Bland  |
| I-4   | Various   |          | Comprehensive Summary of All Found Cases Filed               |
| I-5   | 20-Mar-24 | US Court | Affidavit of Dennis Nenninger                                |
| I-6   | 20-Mar-24 | US Court | File: Exhibit A - 3-20 Starling_v_OnProcess_Technology       |
| I-7   | 20-Mar-24 | US Court | File: Exhibit B - 3-20-24<br>Starling_v_OnProcess_Technology |
| I-8   | 30-Dec-24 | US Court | MotionHearingTranscript-<br>Starling_v_OnProcess_Technology  |
| I-9   | 22-Nov-24 | US Court | File: Vol Dismiss - Starling_v_ATT_Services_Inc              |

| Exhibits J - Continued Compliance After Business Cessation |           |                      |   |
|--|-----------|----------------------|---|
| Exhibit No.  | Date      | Medium               | Description   |
| J-1  | 19-Nov-24 | Email Correspondence | Response to Jonathan Avery regarding Adam’s Network non-compliance, vendor details, and assistance. |

|    |           |                      |  |
|----|-----------|----------------------|--|
| J2 | 16-Dec-24 | Email Correspondence | Response to Mariah Caballero offering to assist in holding Adam’s Network accountable.     |
| J3 | 26-Nov-24 | Email Correspondence | WhatsApp communication with Adam’s Network detailing compliance failures and final notice. |

| Financial Hardship |         |                      |   |
|--------------------|---------|----------------------|---|
| K-1                | Present | Letter               | Terminal Mother’s Hardship Letter                 |
| K-2                | Present | Letter               | Aaron’s Financial Hardship Letter                 |
| K-3                | Present | Letter               | Adriana’s (Spouse & Son's Mother) Hardship Letter |
| K-4                | Present | Statement            | Sworn Statement of Financial Hardship             |
| K-5                | Present | Financial Statements | Financial Statements and Budget Overview          |